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Dear Scoping Committee,

I have been a professor of Geography and Native Studies at The Evergreen State College in Olympia for eight years (and a faculty union member), after four years of teaching at the University of Wisconsin, where I earned my Ph.D. My doctoral dissertation topic was on *Unlikely Alliances: Treaty Conflicts and Environmental Cooperation Between Native and Rural White Communities*. I recently co-edited an anthology on tribal responses to climate change entitled *Asserting Native Resilience: Pacific Rim Indigenous Nations Face the Climate Crisis* (Oregon State University Press, 2012).

My first comments are about the geographic scope of the EIS, and why it should be analyzed cumulatively. In geographic analysis and GIS maps, we do not separate the layers of the natural and the human, the local and the national/global, or “locale” (point) from “location” (network). Every place has networks of “locational” relationships to other places, which help to physically shape the seemingly local place. No place can be seen in artificial isolation from other places.

The front end of the coal fuel chain in this analysis is in the Powder River Basin, and specifically Montana’s Tongue River Valley. The proposed coal terminals on our coast are the middle of the chain. At the end of the chain are the cities and industries of Asia, where last week the declining air quality of Beijing was the subject of a state health emergency (see attached photo). In any professional geographical analysis, the coal fuel chain would be defined as a single system. The “locale” of Cherry Point is tied through the lines of “location” to the Northern Cheyenne and their white rancher neighbors in Montana on one end, and the coughing citizens of Beijing on the other end.

Geographers examine the reality on the ground, not merely the reality on paper. Because the cumulative impacts affect people and environment along the entire length of the coal fuel chain (and back again via Asian air deposition on North America), my professors would scold me for “Bad Geography” if I as a student had tried to mask these realities. It would be akin to planning a football game where only the local team shows up, and to ignore the network of the National Football League. It would be like having a Civil War

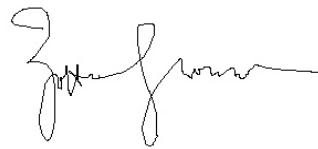
battle with only the local soldiers showing up, and ignoring the constant movement of armies to different battlefields.

The scoping report should at least include the greenhouse gas and particulate emissions from the Asian countries to which the coal would be exported, which are readily available from the Intergovernmental Panel on Climate Change (IPCC), and examine the lack of emission limits in those countries. The existing impacts of climate change are not only felt globally, but locally here in the Pacific Northwest, and are well documented and potentially devastating to our fisheries and shellfish industry. It would be a shame for the West Coast governors, mayors, and citizens, who are at the forefront of climate change response in North America, to see their hard work go to waste by seeing fossil fuel use expand rather than contract.

My final comment is that we citizens of the Pacific Northwest stand with the tribes, particularly the Lummi Nation, but also other member tribes of the Northwest Indian Fisheries Commission (NWIFC) and the Columbia River Intertribal Fish Commission (CRITFC). Indian law scholar Felix Cohen once noted that the erosion of Native American rights is an early warning for the erosion of rights for all Americans. If their burial grounds can be desecrated by a coal terminal project, then no cemeteries are safe. If their treaty-protected fishing grounds and herring spawning beds can be damaged by a long terminal pier, then no fishing grounds are protected. If their shellfish beds can be inundated by coal dust (as has occurred at Tsawwassen), then all shellfish beds are endangered.

If the reservation groundwater is drawn down by withdrawals to wet the coal piles, then the water will be drawn down for everyone in the area. The Montana ranchers who spoke to you knew that if the Northern Cheyenne groundwater was contaminated, their ground and surface waters would be too. “No man is an island,” and no place is in complete isolation, particularly when it is drawn into a complex system of energy and trade. The scoping analysis should be done cumulatively, both taking into account all the people in the Cherry Point area, and all the people along the entire coal fuel chain.

*Sincerely,*

A handwritten signature in black ink, appearing to read 'Zoltan Grossman', with a stylized, flowing script.

Dr. Zoltan Grossman



Beijing, January 12, 2013

